

EXHIBIT A

APPENDIX A

The government anticipates that it will offer expert testimony from Dr. Lorenzo Vidino, Director of the Program on Extremism at George Washington University. Dr. Vidino is expected to testify regarding the following topics related to ISIS:

A. History, Leadership, and Activities of ISIS

Dr. Vidino is expected to testify regarding the history, leadership, infrastructure and geographic bases of operation and control of ISIS.

ISIS has been known by several names during its history. It was founded in 1999 by Abu Musab al-Zarqawi. In 2004, it was designated as a foreign terrorist organization, under the name al-Qaeda in Iraq (“AQI”), by the U.S. Secretary of State. In May 2014, the designation was amended to add the alias the Islamic State of Iraq and the Levant (“ISIL”); the Islamic State of Iraq and al-Sham (i.e., ISIS); the Islamic State of Iraq and Syria; Dawla al Islamiya and Daesh, among other aliases. On June 29, 2014, ISIS announced a change of name to the “Islamic State,” proclaimed itself a caliphate, and pronounced Abu Bakr al-Baghdadi as the caliph. Dr. Vidino will explain that the “caliphate” is or was a nation organized under ISIS’s interpretation of Islamic law, and that, at that time, ISIS controlled certain territory located in Iraq and Syria.

The proclamation of ISIS’s claimed caliphate was widely publicized, and substantial public attention was paid to ISIS’s accretion of territory in Iraq and Syria. Dr. Vidino will describe the public statements and objectives of ISIS and its leaders, which included the establishment of Abu Bakr al-Baghdadi as the leader for Muslims worldwide. In the summer of 2014, recordings released by ISIS and ISIS adherents encouraged Muslims from around the world to engage in “jihad.” Over the course of 2014 in particular, ISIS came to control a number of cities in Iraq, including Mosul and later Sinjar. ISIS’s territorial gains and its treatments of the civilian populations under its control were all widely publicized.

ISIS also made territorial claims in other regions during this period, including but not limited to Libya; Yemen; and Algeria.

Dr. Vidino will also describe and review the terroristic activities undertaken by ISIS and its adherents in the time period at issue in the indictment, that is, 2013 to 2019. Specifically, Dr. Vidino will address, among other terrorist actions, the executions of U.S. journalists James Foley and Steven Sotloff, executions committed via decapitation. These executions were videotaped by ISIS and those videos were widely distributed via the Internet and via mainstream media. ISIS also executed a Jordanian Air Force pilot, Muath Al-Kasasbeh, after his capture in ISIS-controlled territory in or around January 2015. Al-Kasasbeh’s gruesome execution was carried out by burning him alive in a cage.

The government anticipates that Dr. Vidino will also discuss other foreign terrorist organizations in his testimony, including but not limited to Jaish al-Muhajireen wal-Ansar (“JAMWA”). The name “JAMWA” roughly translates to “Army of Foreign Fighters and Supporters.” JAMWA was designated as a Specially Designated Global Terrorist on September 24, 2014. The government anticipates that Dr. Vidino will describe JAMWA’s leadership during the relevant period, including but not limited to its principal leader, Abu Omar al-Shishani, and that Dr. Vidino will address how JAMWA was ultimately absorbed by ISIS during the relevant period.

Dr. Vidino is also expected to address the global response to ISIS’s capture of so much territory, in the form of a coalition that developed in late 2014 to combat ISIS. ISIS, in turn, began to carry out attacks against countries who were members of that coalition, including attacks from within their respective territories. France, the United States, Germany, the United Kingdom, Belgium, Canada, and others endured dozens of attacks between late 2014 and 2019. These attacks—under the direction of, or at the inspiration of, ISIS—included but by no means were limited to: the shooting attack near the Canadian Parliament building in Ottawa, Canada, in October 2014; the shooting attack at the offices of the satirical newspaper Charlie Hebdo in Paris, France, in January 2015; the shooting attack at an art exhibition in Garland, Texas, in May 2015; coordinated bombing and shooting attacks in Paris, France, in November 2015; the airport and subway bombing attacks in Brussels, Belgium, in March 2016; the Pulse nightclub shooting in Orlando, Florida, in June 2016; an August 2018 suicide bombing in Kabul, Afghanistan; and the Easter Sunday 2019 series of suicide bombings in Sri Lanka. See also Gov’t Detention Mem., ECF No. 6 (July 19, 2019). Attacks committed by ISIS adherents and individuals inspired by ISIS were widely publicized.

B. Role of Western or Foreign Fighters in ISIS and ANF

Dr. Vidino is expected to testify that, including but not limited to during the period at issue in the indictment, 2013 to 2019, many individuals from the United States traveled or attempted to travel to Syria for the purpose of joining ISIS.

Foreign fighters, in particular from the West and the United States, were important to ISIS’s overall objective of establishing a caliphate, for several reasons. The propaganda value of a Western recruit to ISIS was considerable, and ISIS utilized several Western or Westernized individuals as spokespersons in their propaganda. ISIS also coveted Western or Westernized recruits due to their ability to blend into Western societies and travel to and from those areas.¹

¹ Via other witnesses, the government expects to present evidence that the defendant—himself Westernized and a fluent English speaker—became an ISIS foreign fighter, training as a sniper and ultimately becoming a trainer of other snipers.

C. Means and Methods of Travel by Individuals to Join ISIS

The government anticipates that Dr. Vidino will testify as to the means and methods of how aspiring foreign fighters traveled to join ISIS, typically in Syria. Foreign fighters utilized various routes, and often took steps to hide their tracks in order to avoid detection by law enforcement personnel. Typically, foreign fighters did not travel directly from their country of origin to Syria but usually transited via an intermediate location. The most common transit location was Turkey, after which aspiring fighters traveled to the Turkish-Syrian border. Frequently, travelers traveled to Turkey from their country of origin, such as the United States, via an intermediate country, so as not to travel directly to Turkey, especially once Turkey became known as a transit destination to Syria.

The government anticipates that Dr. Vidino will testify that, upon arrival on the Turkey-Syria border region, a relationship with a vetted or known ISIS facilitator, an aspiring foreign fighter would ease transit to ISIS-controlled territory as compared to those without such a connection. However, an aspiring foreign fighter did not necessarily need a pre-existing connection to either ISIS in order to succeed in reaching ISIS territory, but could be motivated to make the attempt in the absence of such a connection.

D. Other Testimony

The government expects that Dr. Vidino will also define and provide context for various terms and phrases, including but not limited to bayat, caliphate/hilofat/khilafa, Daesh, Daech, Dawla, din, dunya, extremism, fard-ayn, foreign fighter, foreign terrorist organization (“FTO”), haram, hijrah, inshallah, jihad, jihadist, kafir/kuffar, kunya, Levant, mujahideen, propaganda, Sham, shahada, shaheed, Sharia, tawhid/tawheed, ummah, vouching, and Wilayat. The government expects Dr. Vidino will address these terms in general and as they relate in context to ISIS and/or jihadist organizations in general. Dr. Vidino may also address the topic of radicalization, that is, the process by which an individual accepts a set of extreme ideas, including the legitimization of the use of violence.